

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,

Plaintiff

vs.

COUNTY OF DAUPHIN,
DAUPHIN COUNTY SHERIFF'S

DEPARTMENT and

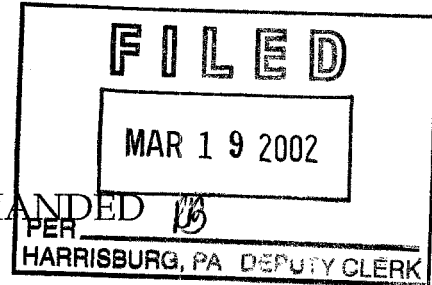
RALPH McALLISTER,

Defendants

: CIVIL ACTION NO.: 1:CV-01-0967

: JUDGE RAMBO

: JURY TRIAL DEMANDED



DEFENDANTS, COUNTY OF DAUPHIN AND DAUPHIN COUNTY SHERIFF'S
DEPARTMENT'S CONCURRED IN MOTION FOR ENLARGEMENT OF TIME

AND NOW, come defendants, Dauphin County and Dauphin County Sheriff's Department, by and through their attorneys, Lavery, Faherty, Young & Patterson, P.C., and file this concurred in motion for enlargement of time and in support thereof aver as follows:

1. Pursuant to this Honorable Court's December 10, 2001 Order, plaintiff filed an amended complaint on February 11, 2002.

2. On March 6, 2002, defendants, County of Dauphin and Dauphin County Sheriff's Department filed a motion to dismiss plaintiff's amended complaint.

3. Pursuant to Local Rule 7.5, moving defendants brief in support of their motion to dismiss plaintiff's amended complaint is due on March 20, 2002.

4. On March 18, 2002, the undersigned defense counsel received notice of an emergency preliminary injunction hearing in the matter of Lantz v. County of

Westmoreland (CCP, Westmoreland County, Number 1781 of 2002) which is scheduled for March 20, 2002 at 9:00 a.m. in Greensburg, Pennsylvania.

5. Upon receipt of the notice of injunctive hearing, the undersigned counsel has been interviewing potential witnesses and preparing for this hearing.

6. The undersigned counsel is in need of a two-day extension of time within which to file the brief in support of the motion to dismiss plaintiff's amended complaint.

7. The requested extension of time is brief in duration, it will not unduly delay the adjudication of this matter on the merit; and it will not prejudice any party's substantive rights.

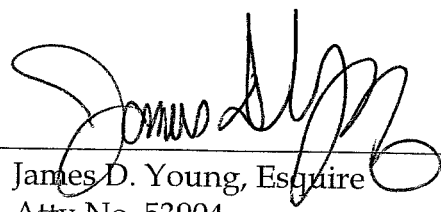
8. Attorney Lappas, plaintiff's counsel, and Attorney Godfrey, counsel for co-defendant McAllister, concur in this request for enlargement of time.

WHEREFORE, moving defendants respectfully request this Honorable Court grant their motion to enlarge time and enter the accompanying court order.

Respectfully submitted,

Lavery, Faherty, Young & Patterson, P.C.

By: _____


James D. Young, Esquire
Atty No. 53904

225 Market Street, Suite 304

P.O. Box 1245

Harrisburg, PA 17108-1245

Attys for Defendants, County of
Dauphin and Dauphin County Sheriff's
Department

DATE: 3/19/2002

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CINDY L. RIGG,

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COUNTY OF DAUPHIN,
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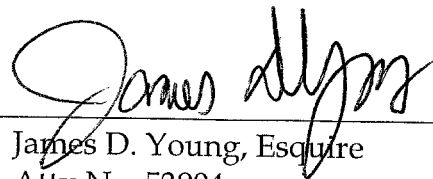
CERTIFICATE OF CONCURRENCE

I, James D. Young, Esquire, do hereby certify that I have obtained the concurrence of Spero Lappas, Esquire, counsel for plaintiff and E. Ralph Godfrey, Esquire, counsel for defendant McAllister in the attached Motion to Enlarge Time.

Respectfully submitted,

Lavery, Faherty, Young & Patterson, P.C.

By: _____



James D. Young, Esquire
Atty No. 53904

225 Market Street, Suite 304

P.O. Box 1245

Harrisburg, PA 17108-1245

Attys for Defendants County of
Dauphin and Dauphin County Sheriff's
Department

DATE: _____

3/19/2002

CERTIFICATE OF SERVICE

I, Megan L. Renno, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 19th day of March, 2002, I served a true and correct copy of the foregoing Defendant's Concurred in Motion for Enlargement of Time via U.S. First Class mail, postage prepaid, addressed as follows:

Spero T. Lappas, Esquire
The Law Offices of Spero T. Lappas
205 State Street
PO Box 808
Harrisburg, PA 17108-0808

E. Ralph Godfrey, Esquire
Metzger, Wickersham, Knauss & Erb, P.C.
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Megan L. Renno